

THE HONORABLE BENJAMIN H. SETTLE

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
IN TACOMA

PEASE & SONS, INC., a Washington  
corporation,

Plaintiff,

v.

OHIO SECURITY INSURANCE  
COMPANY, a foreign insurance company,

Defendant.

No. 3:24-cv-05394-BHS

STIPULATED MOTION AND ORDER  
TO EXTEND CERTAIN COURT  
DEADLINES

**NOTE ON MOTION CALENDAR:  
SEPTEMBER 17, 2024**

**I. STIPULATION**

Plaintiff Pease & Sons, Inc. and Defendant Ohio Security Insurance Company, by and through their respective counsel, jointly file this Stipulation and Motion to Extend the Court Deadlines to exchange Initial Disclosures and file the Joint Status Report and Discovery Plan by four weeks. This Court issued deadlines for the parties to exchange Initial Disclosures no later than September 19, 2024, and to file the Joint Status Report and Discovery Plan by September 26, 2024 (*Dkt. 9*).

STIPULATED MOTION AND ORDER TO EXTEND  
CERTAIN COURT DEADLINES - 1

**Cause No. 3:24-cv-05394-BHS**

**HARPER | HAYES PLLC**  
1200 Fifth Avenue, Suite 1208  
Seattle, Washington 98101  
Telephone: 206-340-8010

1 The parties have reached a tentative settlement, but have not yet executed a settlement  
2 agreement. The parties anticipate finalizing their settlement within four weeks, and therefore  
3 request a corresponding extension of the deadlines to exchange Initial Disclosures and file the  
4 Joint Status Report and Discovery plan.

5 DATED this 17<sup>th</sup> day of September, 2024.

6 HARPER | HAYES PLLC

7 By: s/ Todd C. Hayes

8 Todd C. Hayes, WSBA No. 26361  
9 1200 Fifth Avenue, Suite 1208  
10 Seattle, WA 98101  
11 (206) 340-8010  
12 todd@harperhayes.com  
13 Attorneys for Plaintiff

14 NICOLL BLACK & FEIG PLLC

15 By: s/ Matthew Erickson

16 Matthew Erickson, WSBA # 43790  
17 1325 Fourth Avenue, Suite 1650  
18 Seattle, WA 98101  
19 (206) 838-7555  
20 MErickson@nicollblack.com  
21 Attorneys for Defendant  
22  
23

STIPULATED MOTION AND ORDER TO EXTEND  
CERTAIN COURT DEADLINES - 2

Cause No. 3:24-cv-05394-BHS

HARPER | HAYES PLLC  
1200 Fifth Avenue, Suite 1208  
Seattle, Washington 98101  
Telephone: 206-340-8010

1 **II. ORDER**

2 Based on the above Stipulation, it is ordered that the deadline for the parties to  
3 exchange Initial Disclosures is now October 17, 2024 and the deadline for the parties to submit  
4 their Joint Status Report and Discovery Plan to the Court is now October 24, 2024.

5 DATED THIS 17th day of September, 2024.

6 

7  
8 BENJAMIN H. SETTLE  
9 United States District Judge

10  
11 Presented by:

12 HARPER | HAYES PLLC

13 By: s/ Todd C. Hayes

14 Todd C. Hayes, WSBA # 26361  
15 todd@harperhayes.com  
Attorneys for Plaintiff

16 NICOLL BLACK & FEIG PLLC

17 By: s/ Matthew Erickson

18 Matthew Erickson, WSBA # 43790  
19 MErickson@nicollblack.com  
Attorneys for Defendant

20  
21  
22  
23 STIPULATED MOTION AND ORDER TO EXTEND  
CERTAIN COURT DEADLINES - 3

Cause No. 3:24-cv-05394-BHS

HARPER | HAYES PLLC  
1200 Fifth Avenue, Suite 1208  
Seattle, Washington 98101  
Telephone: 206-340-8010